

# EXHIBIT 1

CAMSHAFT CRE 1 LLC

Plaintiff,

v.

PRIME CAPITAL VENTURES, LLC,

Defendant.

**IN THE CIRCUIT COURT OF THE 11<sup>TH</sup>  
JUDICIAL CIRCUIT IN AND FOR MIAMI-  
DADE COUNTY, FLORIDA**

**COMPLEX BUSINESS LITIGATION  
DIVISION**

**CASE NO. 23-023173-01**

**STIPULATION FOR SUBSTITUTION OF COUNSEL WITH CONSENT**

IT IS HEREBY STIPULATED AND AGREED that David B. Massey, Esq. and the law firm of Hogan Lovells US LLP shall withdraw as counsel for Plaintiff Camshaft CRE 1 LLC (“Plaintiff”), and that Shalia M. Sakona, Esq., and the law firm of Bilzin Sumberg Baena Price & Axelrod LLP shall be substituted as counsel for Plaintiff, effective as of the date the Proposed Order Granting Stipulation for Substitution of Counsel is entered. David B. Massey, Esq. and the law firm of Hogan Lovells US LLP shall have no further responsibility with respect to this matter, and no further pleadings or other papers shall be served upon them.

Pursuant to Florida Rule of Judicial Administration 2.505, Plaintiff’s consent to this substitution of counsel is attached as **Exhibit A**, and a proposed Order Granting Substitution of Counsel is attached as **Exhibit B**.

Dated: February 14, 2024

Respectfully submitted,

/s/ Shalia M. Sakona

Shalia M. Sakona, Esq.  
Florida Bar No. 107398  
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/s/ David B. Massey

David Massey, Esq.

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been served via email generated by the Florida Court E-Filing Portal, 14<sup>th</sup> day of February, 2024, on all counsel of record

By: /s/ Shalia Sakona  
Shalia Sakona

# **EXHIBIT A**

CAMSHAFT CRE 1 LLC

Plaintiff,

v.

PRIME CAPITAL VENTURES, LLC,

Defendant.

**IN THE CIRCUIT COURT OF THE 11<sup>TH</sup>  
JUDICIAL CIRCUIT IN AND FOR MIAMI-  
DADE COUNTY, FLORIDA**

**COMPLEX BUSINESS LITIGATION  
DIVISION**

**CASE NO. 23-023173-01**

**PLAINTIFF'S CONSENT TO SUBSTITUTION OF COUNSEL**

On behalf of Camshaft CRE 1 LLC, I have reviewed the Stipulation for Substitution of Counsel with Consent ("Stipulation") and Proposed Order Granting Substitution of Counsel ("Proposed Order") in this matter, and do hereby consent to the terms and conditions of the Stipulation and Proposed Order.



William Morton

Managing Member, Camshaft CRE 1 LLC

# **EXHIBIT B**

CAMSHAFT CRE 1 LLC

Plaintiff,

v.

PRIME CAPITAL VENTURES, LLC,

Defendant.

**IN THE CIRCUIT COURT OF THE 11<sup>TH</sup>  
JUDICIAL CIRCUIT IN AND FOR MIAMI-  
DADE COUNTY, FLORIDA**

**COMPLEX BUSINESS LITIGATION  
DIVISION**

**CASE NO. 23-023173-01**

**[PROPOSED] ORDER GRANTING SUBSTITUTION OF COUNSEL**

**THIS CAUSE** having come before the Court upon the submission of a Stipulation for Substitution of Counsel with Consent (“Stipulation”), and the Court having approved the Stipulation, having reviewed the file, and otherwise being fully advised in the premises, it is hereby

**ORDERED AND ADJUDGED:**

1. Shalia Sakona, Esq. and the law firm of Bilzin Sumberg Baena Price & Axelrod LLP are hereby substituted for David B. Massey, Esq. and the law firm of Hogan Lovells US LLP as counsel for Plaintiff Camshaft CRE 1 LLC. David B. Massey, Esq. and the law firm of Hogan Lovells US LLP shall have no further responsibility with respect to this matter.
2. All further communications, filings, and pleadings in this matter shall be directed to Bilzin Sumberg Baena Price & Axelrod LLP, 1450 Brickell Avenue, Suite 2300, Miami, Florida 33131.

DONE AND ORDERED in Chambers, Miami-Dade County, Florida this \_\_\_\_ day of  
February, 2024

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THE HONORABLE THOMAS J. REBULL  
CIRCUIT COURT JUDGE